

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA,

Plaintiff,

CASE NO. 00-6273-CR-HUCK/BROWN

vs.

ANTHONY BANKS,

Defendant.

**UNOPPOSED EMERGENCY MOTION FOR CUSTODY
RELEASE TO ATTEND MOTHER'S FUNERAL AND BURIAL**

COMES NOW, ANTHONY BANKS, by and through his undersigned attorney and files this Unopposed Emergency Motion for Custody Release to Attend Mother's Funeral and Burial and states:

1. On Saturday, July 14, 2001, the Defendant's mother, Jeanette Banks, passed away. Her funeral services will be in the Florida Keys and she will be laid to rest in Key West, Florida either on Tuesday or Wednesday of this week.
2. This past Friday, in the late afternoon, undersigned counsel and Assistant United States Attorney, Lawrence D. LaVecchio, had agreed to a one (1) week custody release so that the Defendant could see his mother and be present for her burial. Mr. Banks' mother had been given 1 to 3 days life expectancy at that point.
3. At this time, we are asking the Court to grant this temporary custody release up to this Friday, July 20, 2001 at 5:00 p.m.
4. The conditions of Mr. Banks release, if approved by the Court, would be as follows: (i) \$200,000.00 personal surety to be executed by Crawford Banks, Defendant's father; (ii) the

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Defendant would have an electronic bracelet/monitor; (iii) the Defendant would reside at his father's residence, 130 Coral Avenue, Tavernier, Florida 33070; and (iv) the Defendant would surrender at the Federal Detention Center-Miami by 5:00 p.m. on Friday, July 20, 2001.

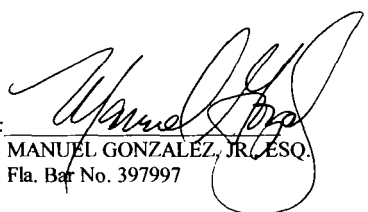
5. Crawford Banks has owned his residence for approximately 17 years and the equity in his residence is approximately \$90,000.00.

WHEREFORE, the Defendant, ANTHONY BANKS, moves this Court to grant this Emergency Motion for Custody Release to Attend the Funeral and Burial of His Mother.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was mailed this 16th day of July, 2001, to Assistant United States Attorney, Lawrence D. LaVecchio, 500 East Broward Blvd., Suite 700, Fort Lauderdale, Florida 33394, U.S. Marshal Service, 301 N. Miami Avenue, Miami, Florida 33128, Federal Detention Center-Miami, 33 N.E. 4th Street, Miami, Florida 33128 and to U.S. Pretrial Services, 330 Biscayne Blvd., Suite 500, Miami, Florida.

BY:


MANUEL GONZALEZ, JR. ESQ.
Fla. Bar No. 397997